

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name:	American Security Products
Facility ID:	059237
SIC Code:	3499
Equipment Location:	11925 Pacific Avenue Fontana, CA 92337
Application #(s):	577303
Application Submittal Date(s):	8/7/15
SCAQMD Contact Person:	Hamed Mandilawi, Senior Engineer
Phone Number:	(909) 396-3275
E-Mail Address:	hmandilawi@aqmd.gov

1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and SCAQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the SCAQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The SCAQMD implements Title V through Regulation XXX – Title V Permits, adopted by the SCAQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, and CO are in attainment with federal standards. The status of lead is

nonattainment. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of American Security Products located at 11925 Pacific Avenue, Fontana, CA 92337. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility applying for a Title V permit renewal that is engaged in the fabrication of steel products. The facility operates spray booths, plasma arc cutting system, cement mixing system, abrasive blasting systems, and other supporting equipment. Particulate matter (PM) emissions from the abrasive blasting systems are vented to air pollution control equipment baghouses.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit at this location since 2001. Numerous permits to construct and/or permits to operate have been issued to the facility since June 2001. A Title V renewal permit was issued to the facility on July 26, 2011.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Sections D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the SCAQMD with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not subject to any NSPS requirements.

The primary activity of this facility is to manufacture security safes. This falls under the source category of Fabricated Metal Products and therefore is subject to 40CFR63 Subpart XXXXXX- National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. The facility complies with NESHAP by conducting the abrasive blasting operation in vented enclosures, and the emissions are captured and vented to air pollution control systems baghouses. Spray coating operation that spray materials that contain more than 0.1 percent by weight of metal carcinogens (cadmium, chromium, lead, or nickel), and/or more than 1 percent of metal noncarcinogens (manganese) are subject to this NESHAP. The spray coating operations at this facility do not contain the above metals.

To ensure that the facility is exempt from the requirements of 40CFR63 Subpart MMMM- National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, facility wide permit conditions are specified in the Title V permit limiting the quantity of a volatile hazardous air pollutant emissions (VHAP) from the facility to less than 10 tons per year and of a combination of VHAPs to less than 25 tons per year.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements with which the facility is required to comply are identified in the Title V permit (for example, Sections D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

PM emissions from the abrasive blasting operations are vented to air pollution control equipment baghouses. However, since the uncontrolled PM₁₀ emissions to each baghouse is less than 70 tons per year, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 are not applicable to the baghouses.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004(c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements that are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2015

Pollutant	Emissions (tons/year)
NO _x	0.159
CO	0.042
VOC	9.935
PM	1.118

Pollutant	Emissions (tons/year)
SOx	0

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2015**

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	44.147
Benzene	0.019
Formaldehyde	0.041

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The SCAQMD is tracking the status of the facility under AB2588.

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 2001. The facility has been subject to both self-reporting requirements and SCAQMD inspections. The facility has had no citizen complaints or Notices of Violations issued in the last two years. However, the facility was issued a Notice to Comply on 9/10/2015 requiring the operator to submit a permit application for an existing laser cutter. The facility submitted the application and is currently operating in compliance with all applicable rules and permit conditions.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this Title V renewal permit, the reporting frequency for compliance certification for the facility shall be annual.